

FILED

AO 91 (Rev. 11/11) Criminal Complaint

MAY 15 2020

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY

DEPUTY

United States of America

v.

Vanessa Tarango

Case No.

EP. 20-M-02350-LS

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 13, 2020 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18, U.S.C. Section 875 -  
Threatening CommunicationsWhoever transmits in interstate or foreign commerce any communication  
containing any threat to injure the person of another

This criminal complaint is based on these facts:

See attached Probable Cause Statement hereby incorporated by reference as if fully restated herein:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 05/15/2020City and state: El Paso, Texas

Complainant's signature

Isaac Frost, FBI Special Agent

Printed name and title

Judge's signature

U.S. Magistrate Judge Leon Schydlower

Printed name and title

telephonically

11:36  
a.m.

**PROBABLE CAUSE STATEMENT**

1. I, Isaac Frost, am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice and conduct investigations of violations of Federal Criminal Law. I have been an FBI Special Agent since September 2017. I am assigned to the FBI's El Paso, Texas Field Office, Violent Crimes Squad. During this time, I have investigated violations of numerous federal criminal statutes, including threats made via instruments of interstate and foreign commerce.

2. The information contained herein is based on my personal knowledge and observations made during the course of this investigation, information conveyed by other law enforcement personnel from, interviews and investigative activity, and the review of records and documents obtained during this investigation.

3. On May 13, 2020, a Facebook user, later identified as **Vanessa Tarango**, made the following post on Facebook, "For the past years or so theres been Walmart shootin that jst keep getting funnuer n funnier immab the nxt one to shoot up Walmart n hopefully one of these x or even my bd will be there Cruel yes but idc more". **Tarango** then responded to comments on her post from other users stating, "lmao bitch they act like imam take time out of my day too shoot these dumb ppl idc or heard of im not gunna get a charge for ppl idk". **Tarango** then posted, "Or maybe only time will tell fukk it". **Tarango** then tagged a Facebook user, later identified as Victim 1, in a post stating, "Hoe got scared n reported it shell be the first one I shoot." "Tagging" a specific individual and/or individuals to a particular Facebook post is one common way of directing the "tagged" individual and/or individuals' attention to the contents of that post. As a result of **Tarango's** post, Victim 1 felt in fear for his / her life, called 911, and made a police report regarding the incident.

4. Additionally, on May 13, 2020, **Tarango** posted, “Imma be on the new for this year Walmart shooting”. Another user responded to **Tarango’s** post stating **Tarango** would be reported and **Tarango** stated, “Idc dude fr they can kiss my ass in jail n ill send them letters sayin there nxt”.

5. On May 13, 2020, FBI Agents determined that **Tarango** was the person associated with the Facebook account that had been making the threatening posts. FBI Agents, Socorro Police Department Detectives, and El Paso Police Department Detectives searched for **Tarango** and successfully contacted her via telephone. **Tarango** then turned herself into the El Paso Police Department where she was arrested for an unrelated outstanding State of Texas probation violation warrant.

6. A video and audio recorded interview of **Tarango** was conducted in which **Tarango** was advised of her Miranda Rights. **Tarango** waived her rights in order to continue speaking to investigators. In the interview **Tarango** stated that the Facebook account which had made the threatening posts was one of her Facebook accounts and that she had made the posts described earlier in this affidavit. **Tarango** stated she was mad because her friend was arrested last week for posting threats about committing a Walmart shooting. **Tarango** was angry about the comments people were posting online regarding her friend (**Tarango’s** friend was arrested by the FBI on May 8, 2020, for posting comments online threatening to commit a Walmart shooting and for being a felon in possession of firearms). **Tarango** stated she did not intend to actually carry out a Walmart shooting but she wanted people to be afraid of her doing so. **Tarango** stated she did not plan on shooting Victim 1 but she wanted Victim 1 to be afraid that **Tarango** would shoot Victim 1 and Victim 1’s child.

7. **Tarango** was located in El Paso, Texas, which is located in the Western District of Texas, when she made the earlier described threatening Facebook messages.

8. Facebook utilizes servers which are located outside of the state of Texas. When a Facebook user posts a picture, video, or message, the media first travels through Facebook servers and then to the recipient of the message or on the Facebook page.

9. Special Agents are aware that the internet is an instrument of interstate and foreign commerce.

10. Based on the facts set forth in this affidavit, there is probable cause to believe that **Vanessa Tarango** has committed violations of Title 18, United States Code (U.S.C.), Section 875(c) Threatening Communications.